

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHANEL MOODY, AYANDA CARMICHAEL,
AND RONNIE CLARK

Plaintiffs,

vs.

THE RELATED COMPANIES, L.P., AND
ERY SOUTH RESIDENTIAL TOWER LLC,

Defendants.

Case No. 1:21-cv-6238 (VEC)

**DECLARATION OF GABRIEL HERRMANN IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' AMENDED COMPLAINT**

I, Gabriel Herrmann, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

1. I am a member of the bar of this Court and a partner in the law firm of Gibson, Dunn & Crutcher LLP ("Gibson Dunn"), counsel to Defendants The Related Companies, L.P. ("Related") and ERY South Residential Tower LLC ("ERY") (together, with Related, "Defendants") in the above-captioned action.

2. I submit this declaration in support of Defendants' October 27, 2021 motion to dismiss Plaintiffs' Amended Complaint.

3. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Amended Complaint in this action, which was filed on October 15, 2021.

4. Attached hereto as Exhibit B is a true and correct copy of a redlined document showing the differences between the original Complaint in this action, filed on July 22, 2021, and the Amended Complaint, filed on October 15, 2021.

Dated: New York, New York
October 27, 2021

/s/ Gabriel Herrmann
Gabriel Herrmann